

COURT OF APPEALS
11 JUN 15 11:49
STATE OF WASHINGTON
BY
DEPUTY

**IN THE COURT OF APPEALS FOR THE STATE OF WASHINGTON
DIVISION II**

In re Personal Restraint Petition of
TERRELL JONES,

Petitioner.

NO. 42223-9

PETITIONER'S MOTION TO
PROCEED IN FORMA PAUPERIS

I. IDENTITY OF MOVING PARTY

Terrell Jones, Petitioner, seeks the relief designated in Part II.

II. STATEMENT OF RELIEF SOUGHT

Waive the filing fee and other costs associated with Petitioner's *Personal Restraint Petition*. A copy of Petitioner's *Statement of Finances* is attached.

III. FACTS

Petitioner is an indigent defendant who seeks to file the attached PRP. Due to his indigence, Petitioner seeks to have the filing fee and other costs waived.

III. ARGUMENT

Pursuant to RAP 16.8, Petitioner respectfully requests that this Court waive the filing fee and other costs associated with his *Personal Restraint Petition*.

ORIGINAL

1 IV. CONCLUSION

2 This Court should waive the filing fee and other costs in this case.
3

4 DATED this 13th day of June, 2011.

5 /s/ Jeffrey E. Ellis

6 Jeffrey E. Ellis, WSBA #17139

7 *Attorney for Mr. Jones*

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CERTIFICATE SUPPORTING MOTION TO PROCEED IN FORMA PAUPERIS

I, Terrell Jones, certify as follows:

1. That I am the Petitioner and I wish to file the enclosed PRP.
2. That I own:
 - (☒) a. No real property
 - () b. Real property valued at \$_____.
3. That I own:
 - (☒) a. No personal property other than my personal effects
 - () b. Personal property (automobile, money, inmate account, motors, tools, etc.) valued at \$_____.
4. That I have the following income:
 - (☒) a. No income from any source.
 - () b. Income from employment, disability payments, SSI, insurance, annuities, stocks, bonds, interests, etc., in the amount of \$_____ on an average monthly basis. I received \$_____ after taxes over the past year.
5. That I have:
 - (☒) a. Undischarged debts in the amount of \$ _____. ?
 - () b. No debts.
6. That I am without other means to prosecute said appeal and desire that public funds be expended for that purpose.
7. That I can contribute the following amount toward the expense of review:
\$ 0.
8. The following is a brief statement of the nature of the case and the issues sought to be reviewed: **See attached brief.**
9. I ask the court to provide the following at public expense, the following: all filing fees, preparation, reproduction, and distribution of briefs, preparation of verbatim report of proceedings, and preparation of necessary clerk's papers.
10. I authorize the court to obtain verification information regarding my financial status from banks, employers, or other individuals or institutions, if appropriate.
11. I certify that I will immediately report any change in my financial status to the court.
12. I certify that this PRP is being filed in good faith.

I, Terrell Jones, certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

5-5-2011 WSP 1313 N 13th Ave Walla Walla, WA 99862
Date and Place

Terrell Jones

Petitioner may file the petition
without payment of a filing fee,

David P. [Signature]

Court Clerk

filing fee waived on 07/08/11
dp

42223-9

IN THE COURT OF APPEALS FOR THE STATE OF WASHINGTON
DIVISION II

IN RE THE PERSONAL RESTRAINT PETITION OF:

TERRELL JONES,

Petitioner.

FILED
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DIVISION II
11 JUN 15 AM 11:49
STATE OF WASHINGTON
DEPUTY

PERSONAL RESTRAINT PETITION

Jeffrey Ellis #17139
Attorney for Mr. Jones

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ORIGINAL

A. IDENTITY OF PETITIONER

Terrell Jones ("Jones") challenges his Clark County convictions for first-degree burglary, second-degree assault, two counts of felony harassment, felony violation of a domestic court order and fourth-degree assault. Mr. Jones (DOC #997684) is currently incarcerated at the Washington State Penitentiary in Walla Walla, Washington, serving a 101 month sentence on the judgment under attack in this petition.

This is Mr. Jones's first collateral attack on this judgment.

B. FACTS

On November 16, 2010, Mr. Jones pled guilty to five crimes as part of a single plea agreement, in other words a "package deal." See *Statement of Defendant on Plea of Guilty* attached as Appendix A.

Those charges included one count of a felony violation of a domestic contact order, a Class C felony. On the guilty plea form, Mr. Jones was told that the "maximum" "term and fine" for this crime was 5 years and \$10,000. The standard range faced by Mr. Jones, given his criminal history, was a singular sentence: "60 months." ¶ 6 (a).

Mr. Jones was also told on the felony violation of the no contact order conviction, in addition to confinement he would be required to serve 12 months or his total earned early release, whichever is longer, of community custody. Later, the plea form reinforced the fact that

community custody was *in addition* to the 60 month prison sentence. ¶ 6

(f).

At no point was Jones told that the combined term of incarceration and community custody could not exceed 5 years. Instead, he was consistently told that the community custody term was “(i)n addition to” the term of confinement. *Id.*

This error was not corrected at sentencing. Instead, Mr. Jones was sentenced to 60 months on the “no contact order” conviction, to be followed by the longer term of 12 months or the period of earned early release. See *Judgment and Sentence, section 4.2* attached as Appendix B.

B. ARGUMENT

Mr. Jones’s guilty plea was invalid because he was given misinformation about community placement/custody, a direct consequence of the plea. As a result, his judgment should be vacated and he should be permitted to withdraw his guilty plea.

Due process requires that a guilty plea be knowing, voluntary, and intelligent. *In re Pers. Restraint of Isadore*, 151 Wn.2d 294, 297, 88 P.3d 390 (2004). A guilty plea is not knowingly made when based on misinformation regarding sentencing consequences. *Isadore*, 151 Wn.2d at 298. A defendant need not be informed of all possible consequences of his plea, but he must be informed of all direct consequences. *State v. Ross*, 129 Wn.2d 279, 284, 916 P.2d 405 (1996).

Mandatory community custody or placement is a direct consequence of pleading guilty. *Isadore*, 151 Wn.2d at 298; *see also State v. Rawson*, 94 Wn.App. 293, 295, 971 P.2d 578 (1999). Consequently, the failure to accurately inform a defendant about the requirements of community custody or placement renders a guilty plea invalid. *Isadore*, 151 Wn.2d at 298; *State v. Turley*, 149 Wn.2d 395, 399, 69 P.3d 338 (2003).

Isadore and *State v. Mendoza*, 157 Wn.2d 582, 141 P.3d 149 (2006), make it clear that it does not matter whether the error worked against or in favor of the defendant. In *Mendoza*, the Supreme Court held that a guilty plea is involuntary when it is based on a miscalculated sentence range, even where the correct sentence range results in a lower sentence. 157 Wn.2d at 584. “Accordingly, we adhere to our precedent establishing that a guilty plea may be deemed involuntary when based on a direct consequence of the plea, regardless of whether the actual sentence range is lower or higher than anticipated. Absent a showing that the defendant was correctly informed of all of the direct consequences of his guilty plea, the defendant may move to withdraw the plea.” *Id.* at 591.

The *Mendoza* opinion starts with the settled law that when a defendant pleads guilty, due process requires that he must do so knowingly, voluntarily, and intelligently. *Id.* at 587; *In re Pers. Restraint of Isadore*, 151 Wn.2d at 297 (2004) (citing *Boykin v. Alabama*, 395 U.S. 238, 242, 89 S.Ct. 1709, 23 L.Ed.2d 274 (1969) (“Consequently, if a

defendant's guilty plea is not equally voluntary and knowing, it has been obtained in violation of due process and is therefore void. Moreover, because a guilty plea is an admission of all the elements of a formal criminal charge, it cannot be truly voluntary unless the defendant possesses an understanding of the law in relation to the facts.”). This standard is reflected in CrR 4.2(d), which mandates that the trial court “shall not accept a plea of guilty, without first determining that it is made voluntarily, competently and with an understanding of the nature of the charge and the consequences of the plea.”

The *Mendoza* court relied on *Isadore*, where the Supreme Court clarified that a defendant who is misinformed of a direct consequence of pleading guilty is not required to show the information was material to his decision to plead guilty in order to seek withdrawal of the plea. (“In determining whether the plea is constitutionally valid, we decline to engage in a subjective inquiry into the defendant’s subjective risk calculation and the reasons underlying his or her decision to accept the plea bargain.”)

Mendoza, 157 Wn.2d at 590-91. A guilty plea based on incorrect information regarding a direct consequence of the plea is deemed involuntary without a case specific showing of materiality because a “reviewing court cannot determine with certainty how a defendant arrived at his personal decision to plead guilty, nor discern what weight a defendant gave to each factor relating to the decision.” *Isadore*, 151 Wn.2d at 302.

Instead, a knowing, voluntary, and intelligent guilty plea requires a meeting of the minds. See *State v. Miller*, 110 Wn.2d 528, 531, 756 P.2d 122 (1988).

Our Supreme Court recently relied on *Isadore* in *In re Personal Restraint of Bradley*, 165 Wash.2d 934, 940–41, 205 P.3d 123 (2009), holding that a personal restraint petitioner could withdraw his plea simply by showing he was misadvised as to a direct consequence. Bradley had pleaded guilty to possessing cocaine and possessing cocaine with intent to deliver, and the sentencing court imposed concurrent sentences. *Bradley*, 165 Wash.2d at 937–38. After Bradley learned that the court had miscalculated his offender score for the simple possession conviction, he filed a PRP seeking to withdraw both guilty pleas. *Bradley*, 165 Wash.2d at 938. Because Bradley's concurrent sentence was longer than the miscalculated sentence, the State argued that the miscalculated sentence “was not a direct consequence of his plea because it had no practical effect on his sentence; he would have served the same sentence either way.” *Bradley*, 165 Wash.2d at 940. The court rejected this argument, noting that the State relied on a case, which had been “eclipsed” by *Isadore*. *Bradley*, 165 Wash.2d at 940. Without discussing PRP standards or the defendant's burden of showing actual prejudice, the court held: “Bradley was misinformed about a direct consequence of his simple possession plea.

Therefore, his plea was involuntary and he is entitled to withdraw it.”

Bradley, 165 Wash.2d at 944.

Mr. Jones’s guilty plea contained misinformation about the direct consequence of community placement. Jones was told that he would be required to serve the longer term of 12 months of the period of earned early release for both the harassment and the “no contact order” counts even if he was sentenced to 60 months in prison. Instead, the law provides a trial court lacks jurisdiction to impose a sentence providing for a term of confinement, community supervision, community placement, or community custody that, when added together with the term of imprisonment, exceeds the statutory maximum for the crime. RCW 9.94A.505(5). *See State v. Zavala-Reynoso*, 127 Wn.App. 119, 124, 110 P.3d 827 (2005) (vacated and remanded for resentencing; the sentence exceeding the statutory maximum); *State v. Sloan*, 121 Wn.App. 220, 223-24, 87 P.3d 1214 (2004) (when a sentence could exceed the statutory maximum sentence for the offense, the trial court should set forth the maximum sentence and state that the total of incarceration and community custody cannot exceed the maximum).

In order to prevail on a collateral attack by way of personal restraint petition the petitioner must first establish that a constitutional error has resulted in actual and substantial prejudice, or that a nonconstitutional error has resulted in a fundamental defect which inherently results in a complete

miscarriage of justice. See *In re Pers. Restraint of Cook* 114 Wash.2d 802, 810, 812, 792 P.2d 506 (1990). A criminal defendant is deprived of his constitutional right to due process when his guilty plea was not knowing, voluntary and intelligent. Washington courts have previously held that in order for a guilty plea to be deemed voluntary in the constitutional sense, a defendant must be informed of all direct consequences of his plea. *State v. Ross*, 129 Wash.2d 279, 284, 916 P.2d 405 (1996) (citing *State v. Barton*, 93 Wash.2d 301, 305, 609 P.2d 1353 (1980)). An involuntary plea produces a manifest injustice.

Mr. Jones is entitled to withdraw all of his guilty pleas because all of his convictions were part of a package deal. *In re PRP of Bradley*, 165 Wn.2d 934, 205 P.3d 123 (2009); *State v. Turley*, 149 Wn.2d 395, 400, 69 P.3d 338 (2003) (where guilty pleas are part of a package deal, they are indivisible and an error as to one justifies withdrawal of both). See also *State v. Ermels*, 156 Wn.2d 528, 541, 131 P.3d 299 (2006); *State v. Bisson*, 156 Wn.2d 507, 519, 130 P.3d 820 (2006). For example, in *Turley*, the State incorrectly represented to the defendant that no mandatory community placement would be required on one of two charges to which the defendant pleaded guilty. When Turley discovered the error, he requested to withdraw his entire plea agreement. The Supreme Court allowed Turley to do so because it reasoned that a plea agreement is essentially a contract made between a defendant and the State; and, under

normal contract principles, it is dependent upon the intent of the parties whether a contract is considered separable or indivisible. Because Turley negotiated and pleaded guilty to two charges contemporaneously, *i.e.*, both pleas were accepted in a single proceeding, Turley could withdraw both pleas. *Turley*, 149 Wn.2d at 400. *See also In re Shale*, 160 Wn.2d 489, 158 P.3d 588 (2007) (rejecting defendant's attempt to split the pleas and reaffirming the indivisibility rule).

The same rule applies to Jones's guilty pleas.

D. CONCLUSION AND PRAYER FOR RELIEF

Based on the above, this Court should vacate Jones's judgment and remand this case to permit Jones to withdraw his guilty pleas.

DATED this 14th day of June, 2011.

Respectfully Submitted:

/s/ Jeffrey E. Ellis
Jeffrey E. Ellis #17139
Attorney for Mr. Jones

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EXHIBIT A

17

FILED
NOV 16 2010
10:24 am
Sherry W. Parker, Clerk, Clark Co.

**SUPERIOR COURT OF WASHINGTON
FOR**

STATE OF WASHINGTON

Plaintiff

v.

Jones, Terrell

Defendant.

NO. 10-1-01093-9

**STATEMENT OF DEFENDANT ON
PLEA OF GUILTY TO NON-SEX
OFFENSE
(STTDFG)**

52
mm

1. My true name is:

Tennell Edmund Turner

2. My age is: 37, DOB 10/2/73

3. I went through the 11th grade. I can/cannot read the English language.

4. I HAVE BEEN INFORMED AND FULLY UNDERSTAND THAT:

(a) I have the right to representation by a lawyer and that if I cannot afford to pay for a lawyer, one will be provided at no expense to me. My lawyer is:

David S. Kutz

(b) I am charged with:

Burglary I / Assault II / Felony Narcotics x2
ON COU (Felony) Assault IV (OM)

The elements are:

See Attached Informata

5. I UNDERSTAND I HAVE THE FOLLOWING IMPORTANT RIGHTS, AND I GIVE THEM ALL UP BY PLEADING GUILTY:

(a) The right to a speedy and public trial by an impartial jury in the county where the crime is alleged to have been committed;

(b) The right to remain silent before and during trial, and the right to refuse to testify against myself;

(c) The right at trial to hear and question the witnesses who testify against me;

(d) The right at trial to testify and to have witnesses testify for me. These witnesses can be made to appear at no expense to me;

(e) I am presumed innocent unless the charge is proven beyond a reasonable doubt or I enter a plea of guilty;

(f) The right to appeal a finding of guilt after a trial.

6. IN CONSIDERING THE CONSEQUENCES OF MY GUILTY PLEA, I UNDERSTAND THAT:

- (a) Each crime with which I am charged carries a maximum sentence, a fine, and a STANDARD SENTENCE RANGE as follows:

COUNT NO.	OFFENDER SCORE	STANDARD RANGE ACTUAL CONFINEMENT (not including enhancements)	PLUS Enhancements	TOTAL ACTUAL CONFINEMENT (standard range including enhancements)	COMMUNITY CUSTODY RANGE (Only applicable for crimes committed on or after July 1, 2000. For crimes committed prior to July 1, 2000, see paragraph 6(f))	MAXIMUM TERM AND FINE
1	9+	87-116 MOS	✓	87-116 MOS	18 MOS	LIFE \$150,000
23	9+	63-84 MOS	✓	63-84 MOS	18 MOS	10 yrs \$20,000
24	9+	57-60 MOS	✓	57-60 MOS	12 MOS	5 yrs \$10,000
25	9+	51-60 MOS	✓	51-60 MOS	12 MOS	5 yrs \$10,000
26	9+	60 MOS	✓	60 MOS	12 MOS	5 yrs \$10,000
27	/	0-365 dys	✓	0-365 dys	24 MOS	2 yrs \$5,000

*(F) Firearm, (D) other deadly weapon, (V) VUCSA in protected zone, (VH) Veh. Hom, See RCW 46.61.520, (JP) Juvenile present

- (b) The standard sentence range is based on the crime charged and my criminal history. Criminal history includes prior convictions and juvenile adjudications or convictions, whether in this state, in federal court, or elsewhere.
- (c) The prosecuting attorney's statement of my criminal history is attached to this agreement. Unless I have attached a different statement, I agree that the prosecuting attorney's statement is correct and complete. If I have attached my own statement, I assert that it is correct and complete. If I am convicted of any additional crimes between now and the time I am sentenced, I am obligated to tell the sentencing judge about those convictions.
- (d) If I am convicted of any new crimes before sentencing, or if any additional criminal history is discovered, both the standard sentence range and the prosecuting attorney's recommendation may increase. Even so, my plea of guilty to this charge is binding on me. I cannot change my mind if additional criminal history is discovered even though the standard sentencing range and the prosecuting

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2 attorney's recommendation increase or a mandatory sentence of life imprisonment
3 without the possibility of parole is required by law.
4

5 (e) In addition to sentencing me to confinement, the judge will order me to pay
6 \$500.00 as a victim's compensation fund assessment. If this crime resulted in
7 injury to any person or damage to or loss of property, the judge will order me to
8 make restitution, unless extraordinary circumstances exist which make restitution
9 inappropriate. The amount of restitution may be up to double my gain or double
10 the victim's loss. The judge may also order that I pay a fine, court costs, attorney
11 fees and the costs of incarceration.

12 (f) For crimes committed prior to July 1, 2000: In addition to sentencing me to
13 confinement, the judge may order me to serve up to one year of community
14 supervision if the total period of confinement ordered is not more than 12 months.
15 If this crime is a drug offense, assault in the second degree, assault of a child in
16 the second degree, or any crime against a person in which a specific finding was
17 made that I or an accomplice was armed with a deadly weapon, the judge will
18 order me to serve at least one year of community placement. If this crime is a
19 vehicular homicide, vehicular assault, or a serious violent offense, the judge will
20 order me to serve at least two years of community placement. The actual period of
21 community placement, community custody, or community supervision may be as
22 long as my earned early release period. During the period of community
23 placement, community custody, or community supervision, I will be under the
24 supervision of the Department of Corrections, and I will have restrictions and
25 requirements placed upon me.

26 For crimes committed on or after July 1, 2000: In addition to sentencing me to
27 confinement, the judge may order me to serve up to one year of community
custody if the total period of confinement ordered is not more than 12 months. If
the crime I have been convicted of falls into one of the offense types listed in the
following chart, the court will sentence me to community custody for the community

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3 custody range established for that offense type unless the judge finds substantial
4 and compelling reasons not to do so. If the period of earned release awarded per
5 RCW 9.94A.150 is longer, that will be the term of my community custody. If the
6 crime I have been convicted of falls into more than one category of offense types
7 listed in the following chart, then the community custody range will be based on the
8 offense type that dictates the longest term of community custody.

9

OFFENSE TYPE	COMMUNITY CUSTODY RANGE
Serious Violent Offenses	³⁶ 24 months or up to the period of earned release, whichever is longer. ^{TJ}
Violent Offenses	¹⁸ 18 months or up to the period of earned release, whichever is longer. ^{TJ}
Crimes Against Persons as defined by RCW 9.94A.440(2)	¹² 9 to 18 months or up to the period of earned release, whichever is longer. ^{TJ}
Offenses under Chapter 69.50 or 69.52 RCW (Not sentenced under RCW 9.94A.120(6))	9 to 12 months or up to the period of earned release, whichever is longer. ^{TJ}

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21 During the period of community custody I will be under the supervision of the
22 Department of Corrections, and I will have restrictions and requirements placed
23 upon me. My failure to comply with these conditions will render me ineligible for
24 general assistance, RCW 74.04.005(6)(h), and may result in the Department of
25 Corrections transferring me to a more restrictive confinement status or other
26 sanctions.

27 (g) The prosecuting attorney will make the following recommendation to the judge:

*Plead as charged, state & A stipulate
to sentence of 101 months*

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3 [] The prosecutor will recommend as stated in the plea agreement, which is
4 incorporated by reference.

5 (h) The judge does not have to follow anyone's recommendation as to sentence. The
6 judge must impose a sentence within the standard range of actual confinement
7 and community custody unless the judge finds substantial and compelling reasons
8 not to do so. If the judge goes outside the standard range, either the state or I can
9 appeal that sentence. If the sentence is within the standard range, no one can
10 appeal the sentence.

11 (i) If I am not a citizen of the United States, a plea of guilty to an offense punishable
12 as a crime under state law is grounds for deportation, exclusion from admission to
13 the United States, or denial of naturalization pursuant to the laws of the United
14 States.

15 (j) I understand that I may not possess, own, or have under my control any firearm
16 unless my right to do so is restored by a court of record and that I must
17 immediately surrender any concealed pistol license. RCW 9.41.040.

18 (k) Public assistance will be suspended during any period of imprisonment.

19 (l) I understand that I will be required to have a biological sample collected for
20 purposes of DNA identification analysis. For offenses committed on or after July 1,
21 2002, I will be required to pay a \$100 DNA collection fee.

22 NOTIFICATION RELATING TO SPECIFIC CRIMES: IF ANY OF THE FOLLOWING
23 PARAGRAPHS DO NOT APPLY, THEY SHOULD BE STRICKEN AND INITIALED BY THE
24 DEFENDANT AND THE JUDGE.

25 [m] This offense is a most serious offense or strike as defined by RCW 9.94A.030, and
26 if I have at least two prior convictions for most serious offenses, whether in this
27 state, in federal court, or elsewhere, the crime for which I am charged carries a
mandatory sentence of life imprisonment without the possibility of parole.

[n] The judge may sentence me as a first-time offender instead of giving a sentence
within the standard range if I qualify under RCW 9.94A.030. This sentence could
~~include as much as 90 days' confinement, and up to two years community~~

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3 supervision if the crime was committed prior to July 1, 2000, or up to two years of
4 community custody if the crime was committed on or after July 1, 2000, plus all of
5 the conditions described in paragraph (e). Additionally, the judge could require me
6 to undergo treatment, to devote time to a specific occupation, and to pursue a
7 prescribed course of study or occupational training.

8 [o] If this crime involves a kidnapping offense involving a minor, I will be required to
9 register where I reside, study or work. The specific registration requirements are
10 set forth in the "Offender Registration" Attachment.

11 (p) If this is a crime of domestic violence and if I, or the victim of the offense, have a
12 minor child, the court may order me to participate in a domestic violence
13 perpetrator program approved under RCW 26.50.150.

14 [q] If this crime involves prostitution, or a drug offense associated with hypodermic
15 needles, I will be required to undergo testing for the human immunodeficiency
16 (AIDS) virus.

17 [r] The judge may sentence me under the special drug offender sentencing
18 alternative (DOSA) if I qualify under former RCW 9.94A.120(6) (for offenses
19 committed before July 1, 2001) or RCW 9.94A.660 (for offenses committed on or
20 after July 1, 2001). This sentence could include a period of total confinement in a
21 state facility for one-half of the midpoint of the standard range plus all of the
22 conditions described in paragraph 6(e). During confinement, I will be required to
23 undergo a comprehensive substance abuse assessment and to participate in
24 treatment. The judge will also impose community custody of at least one-half of
25 the midpoint of the standard range that must include appropriate substance abuse
26 treatment, a condition not to use illegal controlled substances, and a requirement
27 to submit to urinalysis or other testing to monitor that status. Additionally, the judge
could prohibit me from using alcohol or controlled substances, require me to
devote time to a specific employment or training, stay out of certain areas, pay

thirty dollars per month to offset the cost of monitoring and require other conditions, including affirmative conditions.

[s] If the judge finds that I have a chemical dependency that has contributed to the offense, the judge may order me to participate in rehabilitative programs or otherwise to perform affirmative conduct reasonably related to the circumstances of the crime for which I am pleading guilty.

[t] If this crime involves the manufacture, delivery, or possession with the intent to deliver methamphetamine or amphetamine, a mandatory methamphetamine clean-up fine of \$3,000.00 will be assessed. RCW 69.50.401(a)(1)(ii).

[u] If this crime involves a violation of the state drug laws, my eligibility for state and federal food stamps, welfare, and education benefits will be affected. 20 U.S.C. § 1091(r) and 21 U.S.C. § 862a.

[v] If this crime involves a motor vehicle, my driver's license or privilege to drive will be suspended or revoked. If I have a driver's license, I must now surrender it to the court.

[w] If this crime involves the offense of vehicular homicide while under the influence of intoxicating liquor or any drug, as defined by RCW 46.61.502, committed on or after January 1, 1999, an additional two years shall be added to the presumptive sentence for vehicular homicide for each prior offense as defined in RCW 46.61.5055(8).

[x] The crime of _____ has a mandatory minimum sentence of at least _____ years of total confinement. The law does not allow any reduction of this sentence. This mandatory minimum sentence is not the same as the mandatory sentence of life imprisonment without the possibility of parole described in paragraph 6[m].

[y] I am being sentenced for two or more serious violent offenses arising from separate and distinct criminal conduct and the sentences imposed on counts

_____ and _____ will run consecutively unless the judge finds substantial and compelling reasons to do otherwise.

[z] I understand that the offense(s) I am pleading guilty to include a deadly weapon or firearm enhancement. ~~Deadly weapon or firearm enhancements are mandatory, they must be served in total confinement, and they must run consecutively to any other sentence and to any other deadly weapon or firearm enhancements.~~

[aa] I understand that the offenses I am pleading guilty to include both a conviction under RCW 9.41.040 for unlawful possession of a firearm in the first or second degree and one or more convictions for the felony crimes of theft of a firearm or possession of a stolen firearm. ~~The sentences imposed for these crimes shall be served consecutively to each other. A consecutive sentence will also be imposed for each firearm unlawfully possessed.~~

[bb] I understand that if I am pleading guilty to the crime of unlawful practices in obtaining assistance as defined in RCW 74.08.331, no assistance payment shall be made for at least 6 months if this is my first conviction and for at least 12 months if this is my second or subsequent conviction. This suspension of ~~benefits will apply even if I am not incarcerated.~~ RCW 74.08.290.

7. I plead guilty to:

count I Burg 1st Count IV Felay Abrossant
count II Assault 2nd Count V DISCOV Felay
count III Felay Abrossant Count VI Assault IV GR
in the _____ Information. I have received a copy of that Information.

8. I make this plea freely and voluntarily, of my own decision after consulting with my lawyer.

9. No one has threatened harm of any kind to me or to any other person to cause me to make this plea.

10. No person has made promises of any kind to cause me to enter this plea except as set forth in this statement.

11. The judge has asked me to state what I did in my own words that makes me guilty of this crime. This is my statement:

I do not wish to make a factual statement. However, I am pleading guilty because I believe a jury might find me guilty, including an exceptional issue, and I also wish to take advantage of the plea offer.

☒ Instead of making a statement, I agree that the court may review the police reports and/or a statement of probable cause supplied by the prosecution to establish a factual basis for the plea.

☐ With my attorney I have reviewed the police reports and evidence in this case and believe there is sufficient evidence for a jury to conclude I am guilty beyond a reasonable doubt; and, I want to take advantage of the plea offer.

12. My lawyer has explained to me, and we have fully discussed, all of the above paragraphs and the "Offender Registration" Attachment, if applicable. I understand them all. I have been given a copy of this "Statement of Defendant on Plea of Guilty." I have no further questions to ask the judge.


Defendant

I have read and discussed this statement with the defendant and believe that the defendant is competent and fully understands the statement.

Prosecuting Attorney

Bar # *5724*

Print Name

JER

WOCNES

Defendant's Lawyer

Bar #

Print Name

CLARK COUNTY PROSECUTING ATTORNEY
1200 FRANKLIN STREET • PO BOX 5000
VANCOUVER, WASHINGTON 98666-5000
(360) 397-2261 (OFFICE)
(360) 397-2230 (FAX)

1
2
3 The foregoing statement was signed by the defendant in open court in the presence of the
4 defendant's lawyer and the undersigned judge. The defendant asserted that [check appropriate
5 box]:

- 6 ☒ (a) The defendant had previously read the entire statement above and that the defendant
7 understood it in full;
8 ☒ (b) The defendant's lawyer had previously read to him or her the entire statement above
9 and that the defendant understood it in full; or
10 ☐ (c) An interpreter had previously read to the defendant the entire statement above and that
11 the defendant understood it in full. The Interpreter's Declaration is attached.

12 I find the defendant's plea of guilty to be knowingly, intelligently and voluntarily made. Defendant
13 understands the charges and the consequences of the plea. There is a factual basis for the plea.
14 The defendant is guilty as charged.

15 Dated: 11/16/10
16

17 
18 Judge Barbara D. Johnson
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COPY

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF CLARK

STATE OF WASHINGTON,

Plaintiff,

v.

TERRELL EDWARD JONES

Defendant.

Amended
INFORMATION

No. 10-1-01093-9

(CCSO 10-9786)

COMES NOW the Prosecuting Attorney for Clark County, Washington, and does by this inform the Court that the above-named defendant is guilty of the crime(s) committed as follows, to wit:

COUNT 01 - BURGLARY IN THE FIRST DEGREE (DOMESTIC VIOLENCE) - 10.99.020 /9A.52.020/9A.52.020(1)(b)

That he, TERRELL EDWARD JONES, in the County of Clark, State of Washington, on or about July 3, 2010 with intent to commit a crime against a person or property therein, did enter or remain unlawfully in the building of Amanda Rodriguez, located at 16313 NE 77th Circle, Vancouver, WA, and, in entering or while in the building or in immediate flight therefrom, the defendant did intentionally assault any person therein; contrary to Revised Code of Washington 9A.52.020(1)(a)(b).

And further, that this crime was committed by one family or household member against another, and that this is a domestic violence offense as defined by RCW 10.99.020 and within the meaning of RCW 9.41.040. [DV]

This crime is a 'most serious offense' pursuant to the Persistent Offender Accountability Act (RCW 9.94A.030(29), RCW 9.94A.030(34), RCW 9.94A.505(2)(a)(iii) and RCW 9.94A.570).

Further, the State of Washington notifies the Defendant that it is seeking a sentence above the standard sentencing range based upon the following aggravating circumstance(s):

The current offense involved domestic violence, as defined in RCW 10.99.020, and the offense was part of an ongoing pattern of psychological or physical abuse of the victim manifested by multiple incidents over a prolonged period of time. RCW 9.94A.535(3)(h).

The current offense is a burglary and the victim of the burglary was present in the building or residence when the crime was committed. RCW 9.94A.535(3)(u)

1 **COUNT 02 - RESIDENTIAL BURGLARY (DOMESTIC VIOLENCE) - 10.99.020 /9A.52.025**

2 That he, TERRELL EDWARD JONES, in the County of Clark, State of Washington, on or about
3 July 3, 2010, with intent to commit a crime against a person or property therein, did enter or
4 remain unlawfully in the dwelling of Amanda Rodriguez, located at 16313 NE 77th Circle,
Vancouver, WA; contrary to Revised Code of Washington 9A.52.025(1).

5 And further, that this crime was committed by one family or household member against another,
6 and that this is a domestic violence offense as defined by RCW 10.99.020 and within the
meaning of RCW 9.41.040. [DV]

7 **COUNT 03 - ASSAULT IN THE SECOND DEGREE - 9A.36.021 /9A.36.021(1)(e)**

8 That he, TERRELL EDWARD JONES, in the County of Clark, State of Washington, on or about
9 July 3, 2010 with intent to commit a felony, to-wit: Felony Harassment, did intentionally assault
10 Deborah Hamilton, a human being; contrary to Revised Code of Washington 9A.36.021(1)(e).

11 This crime is a 'most serious offense' pursuant to the Persistent Offender Accountability Act
(RCW 9.94A.030(29), RCW 9.94A.030(34), RCW 9.94A.505(2)(a)(iii) and RCW 9.94A.570).

12 **COUNT 04 - HARASSMENT - DEATH THREATS AND PRIOR CRIME OF HARASSMENT -**
13 **9A.46.020(1)(a)(i) /9A.46.020(2)(b)(i), (ii)**

14 That he, TERRELL EDWARD JONES, in the County of Clark, State of Washington, on or about
15 July 3, 2010, knowingly and without lawful authority, did threaten to kill another, immediately or
16 in the future, to-wit: Deborah Hamilton; and the Defendant, by words or conduct, placed the
17 person threatened in reasonable fear that the threat would be carried out; and/or knowingly and
18 without lawful authority, did threaten to cause bodily injury, immediately or in the future, to
19 Deborah Hamilton; and the Defendant by words or conduct, placed the person threatened in
reasonable fear that the threat would be carried out and the defendant had previously been
20 convicted in this state of any crime of Harassment, as defined in RCW 9A.46.060, of the same
victim or members of the victim's family or household or any person specifically named in a no
21 contact order, contrary to Revised Code of Washington 9A.46.020(1)(a)(i) and (2)(b)(i) and (ii).

22 **COUNT 05 - HARASSMENT - PRIOR CRIME OF HARASSMENT (DOMESTIC VIOLENCE) -**
23 **10.99.020 /9A.46.020(1)(a)(i)/9A.46.020(2)(b)(i)**

24 That he, TERRELL EDWARD JONES, in the County of Clark, State of Washington, on or about
25 July 3, 2010, knowingly and without lawful authority, did threaten to cause bodily injury,
26 immediately or in the future, to Amanda Rodriguez; and the Defendant, by words or conduct,
placed the person threatened in reasonable fear that the threat would be carried out and the
27 defendant had previously been convicted in this state of any crime of Harassment, as defined in
28 RCW 9A.46.060, of the same victim or members of the victim's family or household or any
29 person specifically named in a no contact order, contrary to Revised Code of Washington
9A.46.020(1)(a)(i) and (2)(b)(i).

And further, that this crime was committed by one family or household member against another,
and that this is a domestic violence offense as defined by RCW 10.99.020 and within the
meaning of RCW 9.41.040. [DV]

Further, the State of Washington notifies the Defendant that it is seeking a sentence above the standard sentencing range based upon the following aggravating circumstance(s):

The current offense involved domestic violence, as defined in RCW 10.99.020, and the offense was part of an ongoing pattern of psychological or physical abuse of the victim manifested by multiple incidents over a prolonged period of time. RCW 9.94A.535(3)(h).

COUNT 06 - FELONY DOMESTIC VIOLENCE COURT ORDER VIOLATION (ASSAULT) - 26.50.110(4)

That he, TERRELL EDWARD JONES, in the County of Clark, State of Washington, on or about July 3, 2010 with knowledge that the Clark County District Court had previously issued no contact orders pursuant to Chapter 10.99 RCW in Cause Nos. 294599 and 292808, did violate the orders while the orders were in effect by knowingly violating the restraint provisions therein by knowingly violating a provision excluding him from a residence or a specified distance of a location and by violating a provision prohibiting contact with Amanda Rodriguez; and the defendant did intentionally assault Amanda Rodriguez, contrary to Revised Code of Washington 26.50.110(4).

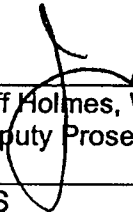
COUNT 07 - ASSAULT IN THE FOURTH DEGREE (DOMESTIC VIOLENCE) - 10.99.020 /9A.36.041

That he, TERRELL EDWARD JONES, in the County of Clark, State of Washington, on or about July 3, 2010 did intentionally assault another person, to-wit: Amanda Rodriguez; contrary to Revised Code of Washington 9A.36.041(1).

And further, that this crime was committed by one family or household member against another, and that this is a domestic violence offense as defined by RCW 10.99.020 and within the meaning of RCW 9.41.040. [DV]

ARTHUR D. CURTIS
Prosecuting Attorney in and for
Clark County, Washington

Date: November 14, 2010

BY: 
Jeff Holmes, WSBA #37904
Deputy Prosecuting Attorney

DEFENDANT: TERRELL EDWARD JONES			
RACE: B	SEX: M	DOB: 10/2/1973	
DOL: JONESTE271PB WA		SID: WA15462242	
HGT: 511	WGT: 175	EYES: BRO	HAIR: BLK
WA DOC:		FBI: 319712PA6	
LAST KNOWN ADDRESS(ES):			

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8 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
9 IN AND FOR THE COUNTY OF CLARK
10 STATE OF WASHINGTON,
11 Plaintiff,
12 v.
13 TERRELL EDWARD JONES
14 Defendant.

NOTICE OF SPECIAL PUNISHMENT
PROVISION

No. 10-1-01093-9
No. 10-1-01093-9

15 COMES NOW, the State of Washington, by and through the Prosecuting Attorney and
16 advises the defendant that the following offense(s) with which the defendant has been charged,
17 is/are either classified as a "most serious offense" pursuant to RCW 9.94A.030(29) or is/are a
18 listed offense pursuant to RCW 9.94A.030(34)(b) or both.

Count	Crime Date	Crime	RCW
01	July 3, 2010	BURGLARY IN THE FIRST DEGREE (DOMESTIC VIOLENCE)	9A.52.020(1)(b)
02	July 3, 2010	ASSAULT IN THE SECOND DEGREE	9A.36.021(1)(e)

19 A person who is convicted in this state of any felony considered a "most serious offense"
20 and who has been convicted on at least two separate occasions of crimes in this state or
21 another state that would be considered "most serious offense", shall be classified as a
22 persistent offender and shall be sentenced to a term of total confinement of life imprisonment
23 without the possibility of parole.

24 A person who is convicted in this state of any felony listed in RCW 9.94A.030(34)(b)(i)
25 and who has been convicted on at least one other occasions of one of the listed crimes in that
26 section, in this state or another state, shall be classified as a persistent offender and shall be
27 sentenced to a term of total confinement of life imprisonment without the possibility of parole.

28 DATED this 15 day of November, 2010.

29 ARTHUR D. CURTIS
Prosecuting Attorney

By: _____
Jeff Holmes, WSBA #37904
Deputy Prosecuting Attorney

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF CLARK

STATE OF WASHINGTON,
Plaintiff,
v.
TERRELL EDWARD JONES,
Defendant

No. 10-1-01093-9

APPENDIX 2.2

DECLARATION OF CRIMINAL HISTORY

COME NOW the parties, and do hereby declare, pursuant to RCW 9.94A.441 that to the best of the knowledge of the defendant and his/her attorney, and the Prosecuting Attorney's Office, the defendant has the following undisputed prior criminal convictions:

CRIME	COUNTY/STATE CAUSE NO.	DATE OF CRIME	DATE OF SENTENCE	PTS.
POSSESS STOLEN PROPERTY 2ND DEGREE	KING/WA 92-1-02993-2			1
ATTEMPT ELUDE PURSUING POLICE	KING/WA 92-1-02993-2			1
ROBBERY 1ST DEGREE	KING/WA 92-1-02993-2			1(2)
THEFT 3	KING/WA K00049571	7/22/1991		
STOLEN PROPERTY 1D - POSSESS	SPOKANE/WA 95-1-01204-4	7/5/1995		1
THEFT - 1D (OBTAIN/EXERT CONTROL)	SPOKANE/WA 95-1-01381-4	3/7/1996		1
THEFT - 1D (OBTAIN/EXERT CONTROL)	SPOKANE/WA 95-1-01381-4	3/7/1996		1
POSSESS STOLEN PROPERTY 1ST DEGREE	KITTITAS/WA 96-1-00082-4	5/13/1996		1
THEFT 3	KITTITAS/WA 96-1-00082-4	5/13/1996		
ATTEMPT TO ELUDE PURSUING POLICE	KITTITAS/WA 96-1-00082-4	5/13/1996		1
TAKING VEHICLE W/O PERMISSION	KING/WA 98-1-00362-2	1/6/1997		1

DECLARATION OF CRIMINAL HISTORY
Revised 9/14/2000

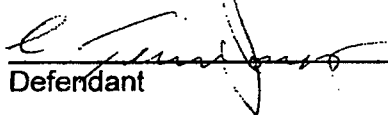
DOMESTIC VIOLENCE PROSECUTION
CENTER
210 EAST 13th STREET
PO BOX 1995
VANCOUVER WA 98668-1995
(360) 487-8530
(360) 487-8531 (FAX)

1	MALICIOUS MISCHIEF - DV	KING/WA Y00181221	6/17/2000		
2	TAKING VEHICLE WITHOUT PERMISSION	KING/WA 01-1-01606-3	2/26/2001		1
3	ATTEMPT ELUDE PURSUING POLICE	KING/WA 01-1-01606-3	2/26/2001		1
4	OBSTRUCT LAW ENFORCEMENT OFFICER	KING/WA 01-1-01606-3	2/26/2001		
5	ASSAULT 4TH DEGREE	ASOTIN/WA 03-1-00009-6	3/5/2003		
6	TAKE VEHICLE W/O PERMISSION 2	KING/WA 05-1-05301-8	3/11/2005		1
7	DWLS 3RD DEGREE	CLARK/WA 287959	2/12/2007		
8	MALICIOUS MISCHIEF 3	CLARK/WA 286145	4/6/2007		
9	RESISTING ARREST	CLARK/WA 292808	8/12/2008		
10	ASSAULT 4TH DEGREE	CLARK/WA 292808	8/12/2008		
11	DWLS 3RD DEGREE	LEWIS/WA C00590851	1/9/2009		
12	DUI	LEWIS/WA C00590851	1/9/2009		
13	PROTECTION ORDER VIOLATION	CLARK/WA 294599	5/31/2009		

☐ The defendant committed a current offense while on community placement (adds one point to score). RCW 9.94A.360.

12 (13)

DATED this _____ day of November, 2010.


Defendant

Attorney for Defendant


Jeffrey W. Holmes, WSBA#37904
Deputy Prosecuting Attorney

DECLARATION OF CRIMINAL HISTORY
Revised 9/14/2000

DOMESTIC VIOLENCE PROSECUTION
CENTER
210 EAST 13th STREET
PO BOX 1995
VANCOUVER WA 98668-1995
(360) 487-8530
(360) 487-8531 (FAX)

EXHIBIT B

14 C. J. Paul
David Kurtz

FILED

S6

NOV 18 2010

Sherry W. Parker, Clerk, Clark Co.

Superior Court of Washington
County of Clark

State of Washington, Plaintiff,

vs.

TERRELL EDWARD JONES,
Defendant.

SID: WA15462242
If no SID, use DOB: 10/2/1973

No. 10-1-01093-9

Felony Judgment and Sentence -
Prison
(FJS) 10-9-07607-6

- ☒ Clerk's Action Required, para 2.1, 4.1, 4.3, 5.2,
5.3, 5.5 and 5.7
☐ Defendant Used Motor Vehicle
☐ Juvenile Decline ☐ Mandatory ☐ Discretionary

I. Hearing

1.1 The court conducted a sentencing hearing this date; the defendant, the defendant's lawyer, and the (deputy) prosecuting attorney were present.

II. Findings

There being no reason why judgment should not be pronounced, in accordance with the proceedings in this case, the court **Finds:**

2.1 **Current Offenses:** The defendant is guilty of the following offenses, based upon

☒ guilty plea 11/18/2010 ☐ jury-verdict ☐ bench trial :

Count	Crime	RCW (w/subsection)	Class	Date of Crime
01	BURGLARY IN THE FIRST DEGREE - DOMESTIC VIOLENCE	10.99.020/9A.52.020/9A.52.020(1)(b)	FA	7/3/2010
03	ASSAULT IN THE SECOND DEGREE	9A.36.021/9A.36.021(1)(e)	FB	7/3/2010
04	HARASSMENT - DEATH THREATS	9A.46.020(2)(b)/9A.46.020(2)(b)(ii)	FC	7/3/2010
05	HARASSMENT - DEATH THREATS - DOMESTIC VIOLENCE	10.99.020/9A.46.020(2)(b)/9A.46.020(2)(b)(ii)	FC	7/3/2010
06	FELONY DOMESTIC VIOLENCE COURT ORDER VIOLATION (ASSAULT)	26.50.110(4)	FC	7/3/2010

Class: FA (Felony-A), FB (Felony-B), FC (Felony-C)

(If the crime is a drug offense, include the type of drug in the second column.)

☐ Additional current offenses are attached in Appendix 2.1a.

The jury returned a special verdict or the court made a special finding with regard to the following:

Felony Judgment and Sentence (FJS) (Prison) (Nonsex Offender)
(RCW 9.94A.500, .505) (WPF CR 84.0400 (7/2009))
Page 1 of 10

- ☐ The defendant used a firearm in the commission of the offense in Count _____, RCW 9.94A.825, 9.94A.533.
- ☐ The defendant used a deadly weapon other than a firearm in committing the offense in Count _____, RCW 9.94A.825, 9.94A.533.
- ☐ Count _____, Violation of the Uniform Controlled Substances Act (VUCSA), RCW 69.50.401 and RCW 69.50.435, took place in a school, school bus, within 1000 feet of the perimeter of a school grounds or within 1000 feet of a school bus route stop designated by the school district; or in a public park, public transit vehicle, or public transit stop shelter; or in, or within 1000 feet of the perimeter of a civic center designated as a drug-free zone by a local government authority, or in a public housing project designated by a local governing authority as a drug-free zone.
- ☐ The defendant committed a crime involving the manufacture of methamphetamine, including its salts, isomers, and salts of isomers, when a juvenile was present in or upon the premises of manufacture in Count _____, RCW 9.94A.605, RCW 69.50.401, RCW 69.50.440.
- ☐ Count _____ is a criminal street gang-related felony offense in which the defendant compensated, threatened, or solicited a minor in order to involve that minor in the commission of the offense. RCW 9.94A.833.
- ☐ Count _____ is the crime of unlawful possession of a firearm and the defendant was a criminal street gang member or associate when the defendant committed the crime. RCW 9.94A.702, 9.94A. _____.
- ☐ The defendant committed ☐ vehicular homicide ☐ vehicular assault proximately caused by driving a vehicle while under the influence of intoxicating liquor or drug or by operating a vehicle in a reckless manner. The offense is, therefore, deemed a violent offense. RCW 9.94A.030.
- ☐ Count _____ involves attempting to elude a police vehicle and during the commission of the crime the defendant endangered one or more persons other than the defendant or the pursuing law enforcement officer. RCW 9.94A.834.
- ☐ Count _____ is a felony in the commission of which the defendant used a motor vehicle. RCW 46.20.285.
- ☐ The defendant has a chemical dependency that has contributed to the offense(s). RCW 9.94A.607.
- ☒ The crime(s) charged in Count 01, 05, 06 involve(s) domestic violence. RCW 10.99.020.
- ☐ Counts _____ encompass the same criminal conduct and count as one crime in determining the offender score. RCW 9.94A.589.
- ☐ Other current convictions listed under different cause numbers used in calculating the offender score are (list offense and cause number):

Crime	Cause Number	Court (county & state)
1		

- ☐ Additional current convictions listed under different cause numbers used in calculating the offender score are attached in Appendix 2.1b.

2.2 Criminal History (RCW 9.94A.525):

Crime	Date of Crime	Date of Sentence	Sentencing Court (County & State)	A or J Adult, Juv.	DV?*	Type
1 See attached criminal history						

*DV: Domestic Violence was pled and proved

- ☒ Additional criminal history is attached in Appendix 2.2.
- ☐ The defendant committed a current offense while on community placement/community custody (adds one point to score). RCW 9.94A.525.
- ☐ The prior convictions for _____ are one offense for purposes of determining the offender score. (RCW 9.94A.525)

☐ The prior convictions for _____ are not counted as points but as enhancements pursuant to RCW 46.61.520.

2.3 Sentencing Data:

Count No.	Offender Score	Seriousness Level	Standard Range (not including enhancements)	Plus Enhancements*	Total Standard Range (including enhancements)	Maximum Term	Maximum Fine
01	9 +	VII	87 MONTHS to 116 MONTHS	-	87 MONTHS to 116 MONTHS	LIFE	\$50,000.00
03	9 +	IV	63 MONTHS to 84 MONTHS	-	63 MONTHS to 84 MONTHS	10 YEARS	\$20,000.00
04	9 +	III	51 MONTHS to 60 MONTHS	-	51 MONTHS to 60 MONTHS	5 YEARS	\$10,000.00
05	9 +	III	51 MONTHS to 60 MONTHS	-	51 MONTHS to 60 MONTHS	5 YEARS	\$10,000.00
06	9 +	V	60 MONTHS	-	60 MONTHS	5 YEARS	\$10,000.00

* (F) Firearm, (D) Other deadly weapons, (V) VUCSA in a protected zone, (VH) Veh. Hom, see RCW 46.61.520, (JP) Juvenile present, (CSG) criminal street gang involving minor, (AE) endangerment while attempting to elude.

☐ Additional current offense sentencing data is attached in Appendix 2.3.

For violent offenses, most serious offenses, or armed offenders, recommended sentencing agreements or plea agreements are ☐ attached. ☐ as follows: _____

2.4 ☐ Exceptional Sentence. The court finds substantial and compelling reasons that justify an exceptional sentence:

☐ below the standard range for Count(s) _____

☐ above the standard range for Count(s) _____

☐ The defendant and state stipulate that justice is best served by imposition of the exceptional sentence above the standard range and the court finds the exceptional sentence furthers and is consistent with the interests of justice and the purposes of the sentencing reform act.

☐ Aggravating factors were ☐ stipulated by the defendant, ☐ found by the court after the defendant waived jury trial, ☐ found by jury, by special interrogatory.

☐ within the standard range for Count(s) _____, but served consecutively to Count(s) _____

Findings of fact and conclusions of law are attached in Appendix 2.4. ☐ Jury's special interrogatory is attached. The Prosecuting Attorney ☐ did ☐ did not recommend a similar sentence.

2.5 Ability to Pay Legal Financial Obligations. The court has considered the total amount owing, the defendant's past, present, and future ability to pay legal financial obligations, including the defendant's financial resources and the likelihood that the defendant's status will change. The court finds:

☐ That the defendant has the ability or likely future ability to pay the legal financial obligations imposed herein. RCW 9.94A.753.

☐ The following extraordinary circumstances exist that make restitution inappropriate (RCW 9.94A.753): _____

☐ The defendant has the present means to pay costs of incarceration. RCW 9.94A.760.

III. Judgment

3.1 The defendant is **guilty** of the Counts and Charges listed in Paragraph 2.1 and Appendix 2.1:

3.2 ☒ The court **dismisses** Counts 02 (RESIDENTIAL BURGLARY - DOMESTIC VIOLENCE) in the charging document.

IV. Sentence and Order

It is ordered:

4.1 Confinement. The court sentences the defendant to total confinement as follows:

- (a) **Confinement.** RCW 9.94A.589. A term of total confinement in the custody of the Department of Corrections (DOC):

101 months on Count 01

84 months on Count 03

60 months on Count 04

60 months on Count 05

60 months on Count 06

☐ The confinement time on Count(s) _____ contain(s) a mandatory minimum term of _____

☐ The confinement time on Count _____ includes _____ months as enhancement for ☐ firearm ☐ deadly weapon ☐ VUCSA in a protected zone ☐ manufacture of methamphetamine with juvenile present.

Actual number of months of total confinement ordered is: 101

All counts shall be served concurrently, except for the portion of those counts for which there is an enhancement as set forth above at Section 2.3, and except for the following counts which shall be served consecutively: _____

The sentence herein shall run consecutively with any other sentence previously imposed in any other case, including other cases in District Court or Superior Court, unless otherwise specified herein: _____

Confinement shall commence immediately unless otherwise set forth here: _____

- (b) **Credit for Time Served:** The defendant shall receive 138 days credit for time served prior to sentencing for confinement that was solely under this cause number. RCW 9.94A.505. The jail shall compute earned early release credits (good time) pursuant to its policies and procedures

(c) ☐ **Work Ethic Program.** RCW 9.94A.690, RCW 72.09.410. The court finds that the defendant is eligible and is likely to qualify for work ethic program. The court recommends that the defendant serve the sentence at a work ethic program. Upon completion of work ethic program, the defendant shall be released on community custody for any remaining time of total confinement, subject to the conditions in Section 4.2. Violation of the conditions of community custody may result in a return to total confinement for the balance of the defendant's remaining time of confinement.

4.2 Community Custody. (To determine which offenses are eligible for or required for community custody see RCW 9.94A.701)

(A) The defendant shall be on community custody for the longer of:

- (1) the period of early release. RCW 9.94A.728(1)(2); or
(2) the period imposed by the court, as follows:

Count(s) _____ 36 months for Serious Violent Offenses

Count(s) 1, 3 18 months for Violent Offenses

Count(s) 6 12 months (for crimes against a person, drug offenses, or offenses involving the unlawful possession of a firearm by a street gang member or associate)

(B) While on community custody, the defendant shall: (1) report to and be available for contact with the assigned community corrections officer as directed; (2) work at DOC-approved education, employment and/or community restitution (service); (3) notify DOC of any change in defendant's address or employment; (4) not consume controlled substances except pursuant to lawfully issued prescriptions; (5) not unlawfully possess controlled substances while on community custody; (6) not own, use, or possess firearms or ammunition; (7) pay supervision fees as determined by DOC; (8) perform affirmative acts as required by DOC to confirm compliance with the orders of the court; and (9) abide by any additional conditions imposed by DOC under RCW 9.94A.704 and .706. The defendant's residence location and living arrangements are subject to the prior approval of DOC while on community custody.

The court orders that during the period of supervision the defendant shall:

- ☐ consume no alcohol.
- ☒ have no contact with: Amanda Rodriguez, Deborah Hamilton.
- ☐ remain ☐ within ☐ outside of a specified geographical boundary, to wit: _____
- ☐ not serve in any paid or volunteer capacity where he or she has control or supervision of minors under 13 years of age.
- ☐ participate in the following crime-related treatment or counseling services: _____
- ☒ undergo an evaluation for treatment for ☒ domestic violence ☐ substance abuse ☒ mental health ☐ anger management, and fully comply with all recommended treatment. _____
- ☐ comply with the following crime-related prohibitions: _____
- _____
- ☐ Additional conditions are imposed in Appendix 4.2, if attached or are as follows: _____
- _____
- _____

Court Ordered Treatment: If any court orders mental health or chemical dependency treatment, the defendant must notify DOC and the defendant must release treatment information to DOC for the duration of incarceration and supervision. RCW 9.94A.562.

4.3 Legal Financial Obligations: The defendant shall pay to the clerk of this court:

JASS CODE

RTN/RJN	STO BE SET	Restitution to: _____ (Name and Address--address may be withheld and provided confidentially to Clerk of the Court's office.)
PCV	\$ 500.00	Victim assessment RCW 7.68.035
PDV	100.00	Domestic Violence assessment RCW 10.99.080
CRC	\$ _____	Court costs, including RCW 9.94A.760, 9.94A.505, 10.01.160, 10.46.190
		Criminal filing fee \$ 200.00 FRC
		Witness costs \$ _____ WFR
		Sheriff service fees \$ _____ SFR/SFS/SFW/WRF
		Jury demand fee \$ _____ JFR

Extradition costs \$ _____ EXT
 Other \$ _____
 PUB \$ 1,500.00 Fees for court appointed attorney RCW 9.94A.760
 \$ _____ Trial per diem, if applicable.
 WFR _____ Court appointed defense expert and other defense costs RCW 9.94A.760
 \$ _____ DUI fines, fees and assessments
 FCM/MTH \$ 500.00 Fine RCW 9A.20.021; ☐ VUCSA chapter 69.50 RCW, ☐ VUCSA
 additional fine deferred due to indigency RCW 69.50.430
 CDF/LDI/PCD \$ _____ Drug enforcement Fund # ☐ 1015 ☐ 1017 (TF) RCW 9.94A.760
 NTF/SAD/SDI \$ 100.00 DNA collection fee RCW 43.43.7541
 CLF \$ _____ Crime lab fee ☐ suspended due to indigency RCW 43.43.690
 FPV \$ _____ Specialized forest products RCW 76.48.140
 RTN/RJN \$ _____ Emergency response costs (Vehicular Assault, Vehicular Homicide, Felony DUI
 only, \$1000 maximum) RCW 38.52.430
 \$ _____ Other fines or costs for: _____
 \$ _____ **Total** RCW 9.94A.760

☒ The above total does not include all restitution or other legal financial obligations, which may be set by
 later order of the court. An agreed restitution order may be entered. RCW 9.94A.753. A restitution
 hearing:

☒ shall be set by the prosecutor.

☐ is scheduled for _____ (date).

☒ The defendant waives any right to be present at any restitution hearing (sign initials): _____

☐ **Restitution** Schedule attached.

☐ Restitution ordered above shall be paid jointly and severally with:

RJN	Name of other defendant	Cause Number	Victim's name	Amount

The Department of Corrections (DOC) or clerk of the court shall immediately issue a Notice of Payroll
 Deduction. RCW 9.94A.7602, RCW 9.94A.760(8).

All payments shall be made in accordance with the policies of the clerk of the court and on a schedule
 established by DOC or the clerk of the court, commencing immediately, unless the court specifically sets forth
 the rate here: Not less than \$ _____ per month commencing _____
 RCW 9.94A.760.

The defendant shall report to the clerk of the court or as directed by the clerk of the court to provide financial
 and other information as requested. RCW 9.94A.760(7)(b).

☐ The court orders the defendant to pay costs of incarceration at the rate of \$ _____ per day, (actual
 costs not to exceed \$100 per day). (JLR) RCW 9.94A.760.

The financial obligations imposed in this judgment shall bear interest from the date of the judgment until payment in full, at the rate applicable to civil judgments. RCW 10.82.090. An award of costs on appeal against the defendant may be added to the total legal financial obligations. RCW 10.73.160.

4.4 DNA Testing. The defendant shall have a biological sample collected for purposes of DNA identification analysis and the defendant shall fully cooperate in the testing. The appropriate agency shall be responsible for obtaining the sample prior to the defendant's release from confinement. RCW 43.43.754.

☐ **HIV Testing.** The defendant shall submit to HIV testing. RCW 70.24.340.

4.5 No Contact:

☒ The defendant shall not have contact with AMANDA MARY RODRIGUEZ (LIFETIME), DEBORAH SUSAN HAMILTON (TEN YEARS) including, but not limited to, personal, verbal, telephonic, written or contact through a third party for years (which does not exceed the maximum statutory sentence).

☒ The defendant is excluded or prohibited from coming within:

☒ 500 feet ☐ 880 feet ☐ 1000 feet of:

☒ AMANDA M. RODRIGUEZ, DEBORAH S. HAMILTON (name of protected person(s))'s

☒ home/ residence ☒ work place ☒ school

☐ (other location(s)) _____

☐ other location _____

for LIFETIME AND TEN years, as indicated above (which does not exceed the maximum statutory sentence).

☒ A separate Domestic Violence No-Contact Order, Antiharassment No-Contact Order, or Sexual Assault Protection Order is filed concurrent with this Judgment and Sentence.

4.6 Other: _____

4.7 Off-Limits Order. (Known drug trafficker). RCW 10.66.020. The following areas are off limits to the defendant while under the supervision of the county jail or Department of Corrections: _____

4.8 For Offenders on Community Custody, when there is reasonable cause to believe that the defendant has violated a condition or requirement of this sentence, the defendant shall allow, and the Department of Corrections is authorized to conduct, searches of the defendant's person, residence, automobile or other personal property. Residence searches shall include access, for the purpose of visual inspection, all areas of the residence in which the defendant lives or has exclusive/joint control/access and automobiles owned or possessed by the defendant.

4.9 If the defendant is removed/deported by the U.S. Immigration and Customs Enforcement, the Community Custody time is tolled during the time that the defendant is not reporting for supervision in the United States. The defendant shall not enter the United States without the knowledge and permission of the U.S. Immigration and Customs Enforcement. If the defendant re-enters the United States, he/she shall immediately report to the Department of Corrections if on community custody or the Clerk's Collections Unit, if not on Community Custody for supervision.

V. Notices and Signatures

- 5.1 Collateral Attack on Judgment.** If you wish to petition or move for collateral attack on this Judgment and Sentence, including but not limited to any personal restraint petition, state habeas corpus petition, motion to vacate judgment, motion to withdraw guilty plea, motion for new trial or motion to arrest judgment, you must do so within one year of the final judgment in this matter, except as provided for in RCW 10.73.100. RCW 10.73.090.
- 5.2 Length of Supervision.** If you committed your offense prior to July 1, 2000, you shall remain under the court's jurisdiction and the supervision of the Department of Corrections for a period up to 10 years from the date of sentence or release from confinement, whichever is longer, to assure payment of all legal financial obligations unless the court extends the criminal judgment an additional 10 years. If you committed your offense on or after July 1, 2000, the court shall retain jurisdiction over you, for the purpose of your compliance with payment of the legal financial obligations, until you have completely satisfied your obligation, regardless of the statutory maximum for the crime. RCW 9.94A.760 and RCW 9.94A.505(5). The clerk of the court has authority to collect unpaid legal financial obligations at any time while you remain under the jurisdiction of the court for purposes of your legal financial obligations. RCW 9.94A.760(4) and RCW 9.94A.753(4).
- 5.3 Notice of Income-Withholding Action.** If the court has not ordered an immediate notice of payroll deduction in Section 4.1, you are notified that the Department of Corrections (DOC) or the clerk of the court may issue a notice of payroll deduction without notice to you if you are more than 30 days past due in monthly payments in an amount equal to or greater than the amount payable for one month. RCW 9.94A.7602. Other income-withholding action under RCW 9.94A.760 may be taken without further notice. RCW 9.94A.7606.
- 5.4 Community Custody Violation.**
- (a) If you are subject to a first or second violation hearing and DOC finds that you committed the violation, you may receive as a sanction up to 60 days of confinement per violation. RCW 9.94A.633.
 - (b) If you have not completed your maximum term of total confinement and you are subject to a third violation hearing and DOC finds that you committed the violation, DOC may return you to a state correctional facility to serve up to the remaining portion of your sentence. RCW 9.94A.714.
- 5.5 Firearms.** You may not own, use or possess any firearm unless your right to do so is restored by a superior court in Washington State, and by a federal court if required. You must immediately surrender any concealed pistol license. (The clerk of the court shall forward a copy of the defendant's driver's license, identicard, or comparable identification to the Department of Licensing along with the date of conviction or commitment.) RCW 9.41.040, 9.41.047.
- 5.6 Reserved**
- 5.7 Motor Vehicle:** If the court found that you used a motor vehicle in the commission of the offense, then the Department of Licensing will revoke your driver's license. The clerk of the court is directed to immediately forward an Abstract of Court Record to the Department of Licensing, which must revoke your driver's license. RCW 46.20.285.
- 5.8 Other:** _____
- 5.9 Persistent Offense Notice**
- The crime(s) in count(s) 01, 03 is/are "most serious offense(s)." Upon a third conviction of a "most serious offense", the court will be required to sentence the defendant as a persistent offender to life imprisonment without the possibility of early release of any kind, such as parole or community custody. RCW 9.94A.030, 9.94A.570

The crime(s) in count(s) _____ is/are one of the listed offenses in RCW 9.94A.030.(31)(b). Upon a second conviction of one of these listed offenses, the court will be required to sentence the defendant as a persistent offender to life imprisonment without the possibility of early release of any kind, such as parole or community custody.

Done in Open Court and in the presence of the defendant this date: 11/18/10

[Signature]
Judge/Print Name: Barbara D. Johnson

[Signature]
Deputy Prosecuting Attorney
WSBA No. 37904
Print Name: Jeffrey W. Holmes

[Signature]
Attorney for Defendant
WSBA No. 12152
Print Name: David S. Kurtz

[Signature]
Defendant
Print Name: TERRELL EDWARD JONES

Voting Rights Statement: I acknowledge that I have lost my right to vote because of this felony conviction. If I am registered to vote, my voter registration will be cancelled.

My right to vote is provisionally restored as long as I am not under the authority of DOC (not serving a sentence of confinement in the custody of DOC and not subject to community custody as defined in RCW 9.94A.030). I must re-register before voting. The provisional right to vote may be revoked if I fail to comply with all the terms of my legal financial obligations or an agreement for the payment of legal financial obligations

My right to vote may be permanently restored by one of the following for each felony conviction: a) a certificate of discharge issued by the sentencing court, RCW 9.94A.637; b) a court order issued by the sentencing court restoring the right, RCW 9.92.066; c) a final order of discharge issued by the indeterminate sentence review board, RCW 9.96.050; or d) a certificate of restoration issued by the governor, RCW 9.96.020. Voting before the right is restored is a class C felony, RCW 29A.84.660. Registering to vote before the right is restored is a class C felony, RCW 29A.84.140.

Defendant's signature: [Signature]

I am a certified or registered interpreter, or the court has found me otherwise qualified to interpret, in the _____ language, which the defendant understands. I interpreted this Judgment and Sentence for the defendant into that language.

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Signed at Vancouver, Washington on (date): 11/18/10

Interpreter _____

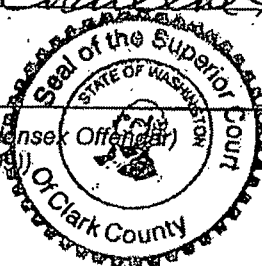
Print Name _____

I, Sherry Parker, Clerk of this Court, certify that the foregoing is a full, true and correct copy of the Judgment and Sentence in the above-entitled action now on record in this office.

Witness my hand and seal of the said Superior Court affixed this date: 11-18-2010

Clerk of the Court of said county and state, by: [Signature] Deputy Clerk

Felony Judgment and Sentence (FJS) (Prison)(Nonsex Offender)
(RCW 9.94A.500, .505)(WPF CR 84.0400 (7/2009))
Page 9 of 10



Identification of the Defendant

TERRELL EDWARD JONES

10-1-01093-9

SID No: WA15462242

Date of Birth: 10/2/1973

(If no SID take fingerprint card for State Patrol)

FBI No. 319712PA6

Local ID No. 188083

PCN No. _____

Other _____

Alias name, DOB:

Race: B

Ethnicity:

Sex: M

Fingerprints: I attest that I saw the same defendant who appeared in court on this document affix his or her fingerprints and signature thereto.

Clerk of the Court, Deputy Clerk, MA [Signature]

Dated: 11-18-10

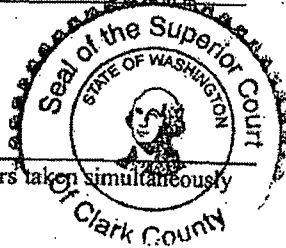
The defendant's signature: Terrell Jones

Left four fingers taken simultaneously

Left
Thumb

Right
Thumb

Right four fingers taken simultaneously



SUPERIOR COURT OF WASHINGTON - COUNTY OF CLARK

STATE OF WASHINGTON, Plaintiff,

v.

TERRELL EDWARD JONES,

Defendant.

SID: WA15462242

DOB: 10/2/1973

NO. 10-1-01093-9

**WARRANT OF COMMITMENT TO STATE
OF WASHINGTON DEPARTMENT OF
CORRECTIONS**

THE STATE OF WASHINGTON, to the Sheriff of Clark County, Washington, and the State of Washington, Department of Corrections, Officers in charge of correctional facilities of the State of Washington:

GREETING:

WHEREAS, the above-named defendant has been duly convicted in the Superior Court of the State of Washington of the County of Clark of the crime(s) of:

COUNT	CRIME	RCW	DATE OF CRIME
01	BURGLARY IN THE FIRST DEGREE - DOMESTIC VIOLENCE	10.99.020/9A.52.020/9A.52.020(1)(b)	7/3/2010.
03	ASSAULT IN THE SECOND DEGREE	9A.36.021/9A.36.021(1)(e)	7/3/2010
04	HARASSMENT - DEATH THREATS	9A.46.020(2)(b)/9A.46.020(2)(b)(ii)	7/3/2010
05	HARASSMENT - DEATH THREATS - DOMESTIC VIOLENCE	10.99.020/9A.46.020(2)(b)/9A.46.020(2)(b)(ii)	7/3/2010
06	FELONY DOMESTIC VIOLENCE COURT ORDER VIOLATION (ASSAULT)	26.50.110(4)	7/3/2010

and Judgment has been pronounced and the defendant has been sentenced to a term of imprisonment in such correctional institution under the supervision of the State of Washington, Department of Corrections, as shall be designated by the State of Washington, Department of Corrections pursuant to RCW 72.13, all of which appears of record; a certified copy of said judgment being endorsed hereon and made a part hereof,

NOW, THIS IS TO COMMAND YOU, said Sheriff, to detain the defendant until called for by the transportation officers of the State of Washington, Department of Corrections, authorized to conduct defendant to the appropriate facility, and this is to command you, said Superintendent of the appropriate facility to receive defendant from said officers for confinement, classification and placement in such correctional facilities under the supervision of the State of Washington, Department of Corrections, for a term of confinement of:

COUNT	CRIME	TERM
-------	-------	------

WARRANT OF COMMITMENT

COUNT	CRIME	TERM
01	BURGLARY IN THE FIRST DEGREE - DOMESTIC VIOLENCE	101 Days/Months
03	ASSAULT IN THE SECOND DEGREE	84 Days/Months
04	HARASSMENT - DEATH THREATS	60 Days/Months
05	HARASSMENT - DEATH THREATS - DOMESTIC VIOLENCE	60 Days/Months
06	FELONY DOMESTIC VIOLENCE COURT ORDER VIOLATION (ASSAULT)	60 Days/Months

These terms shall be served concurrently to each other unless specified herein:

The defendant has credit for 138 days served.

The term(s) of confinement (sentence) imposed herein shall be served consecutively to any other term of confinement (sentence) which the defendant may be sentenced to under any other cause in either District Court or Superior Court unless otherwise specified herein:

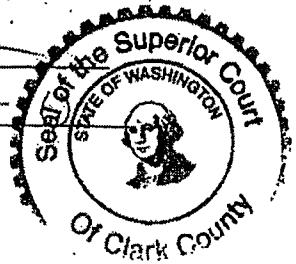
And these presents shall be authority for the same.

HEREIN FAIL NOT.

WITNESS, Honorable

JUDGE OF THE SUPERIOR COURT AND THE SEAL THEREOF THIS DATE: 11-18-

SHERRY W. PARKER, Clerk of the
Clark County Superior Court



By: [Signature]

Deputy

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF CLARK

STATE OF WASHINGTON,
Plaintiff,
v.
TERRELL EDWARD JONES,
Defendant

No. 10-1-01093-9

APPENDIX 2.2

DECLARATION OF CRIMINAL HISTORY

COME NOW the parties, and do hereby declare, pursuant to RCW 9.94A.441 that to the best of the knowledge of the defendant and his/her attorney, and the Prosecuting Attorney's Office, the defendant has the following undisputed prior criminal convictions:

CRIME	COUNTY/STATE CAUSE NO.	DATE OF CRIME	DATE OF SENTENCE	PTS.
POSSESS STOLEN PROPERTY 2ND DEGREE	KING/WA 92-1-02993-2			1
ATTEMPT ELUDE PURSUING POLICE	KING/WA 92-1-02993-2			1
ROBBERY 1ST DEGREE	KING/WA 92-1-02993-2			1(2)
THEFT 3	KING/WA K00049571	7/22/1991		
STOLEN PROPERTY 1D - POSSESS	SPOKANE/WA 95-1-01204-4	7/5/1995		1
THEFT - 1D (OBTAIN/EXERT CONTROL)	SPOKANE/WA 95-1-01381-4	3/7/1996		1
THEFT - 1D (OBTAIN/EXERT CONTROL)	SPOKANE/WA 95-1-01381-4	3/7/1996		1
POSSESS STOLEN PROPERTY 1ST DEGREE	KITTITAS/WA 96-1-00082-4	5/13/1996		1
THEFT 3	KITTITAS/WA 96-1-00082-4	5/13/1996		
ATTEMPT TO ELUDE PURSUING POLICE	KITTITAS/WA 96-1-00082-4	5/13/1996		1
TAKING VEHICLE W/O PERMISSION	KING/WA 98-1-00362-2	1/6/1997		1

DECLARATION OF CRIMINAL HISTORY
Revised 9/14/2000

DOMESTIC VIOLENCE PROSECUTION
CENTER
210 EAST 13th STREET
PO BOX 1995
VANCOUVER WA 98668-1995
(360) 487-8530
(360) 487-8531 (FAX)

1	MALICIOUS MISCHIEF - DV	KING/WA Y00181221	6/17/2000		
2	TAKING VEHICLE WITHOUT PERMISSION	KING/WA 01-1-01606-3	2/26/2001		1
3	ATTEMPT ELUDE PURSUING POLICE	KING/WA 01-1-01606-3	2/26/2001		1
4	OBSTRUCT LAW ENFORCEMENT OFFICER	KING/WA 01-1-01606-3	2/26/2001		
5	ASSAULT 4TH DEGREE	ASOTIN/WA 03-1-00009-6	3/5/2003		
6	TAKE VEHICLE W/O PERMISSION 2	KING/WA 05-1-05301-8	3/11/2005		1
7	DWLS 3RD DEGREE	CLARK/WA 287959	2/12/2007		
8	MALICIOUS MISCHIEF 3	CLARK/WA 286145	4/6/2007		
9	RESISTING ARREST	CLARK/WA 292808	8/12/2008		
10	ASSAULT 4TH DEGREE	CLARK/WA 292808	8/12/2008		
11	DWLS 3RD DEGREE	LEWIS/WA C00590851	1/9/2009		
12	DUI	LEWIS/WA C00590851	1/9/2009		
13	PROTECTION ORDER VIOLATION	CLARK/WA 294599	5/31/2009		

☐ The defendant committed a current offense while on community placement (adds one point to score). RCW 9.94A.360.

DATED this _____ day of November, 2010.

Terrell Jones
Defendant

Attorney for Defendant

Jeffrey W. Holmes, WSBA#37904
Deputy Prosecuting Attorney

DECLARATION OF CRIMINAL HISTORY
Revised 9/14/2000

DOMESTIC VIOLENCE PROSECUTION
CENTER
210 EAST 13th STREET
PO BOX 1995
VANCOUVER WA 98668-1995
(360) 487-8530
(360) 487-8531 (FAX)

VERIFICATION OF PETITION

I, Terrell Jones, verify under penalty of perjury that the attached petition is true and correct and filed on my behalf.

5-5-2014 WSp 1313 N. 13th Ave Walla Walla Wa. 99362
Date and Place

Terrell E Jones
Terrell Jones